

RE: JENNIFER D TURNER

) Case No. 20 B 21652  
)  
Debtor ) Chapter 13  
)  
) Judge: JACK B SCHMETTERER

**NOTICE OF MOTION**

JENNIFER D TURNER

CUTLER & ASSOC  
via Clerk's ECF noticing procedures

5339 LINCOLN AVE  
SKOKIE, IL 60077

Please take notice that on March 10, 2021 at 11:00 am., I will appear before the Honorable Judge JACK B SCHMETTERER or any judge sitting in the judge's place, present the motion set forth below.

**This motion will be presented and heard electronically using AT&T Teleconference.**

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must call this toll-free number: 1-877-336-1839. Then enter access code 3900709 followed by the pound (#) sign.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on February 04, 2021.

/s/ M.O. Marshall

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes M.O. Marshall, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On December 17, 2020 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Remove or amend the provision in Part 8.1 of the Plan which provides for a retroactive payment increase and amend Part 3.1 to increase arrears claim of Land Bank Financial as per its proof of claim which is causing the plan to be unfeasible.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,  
/s/ M.O. Marshall

M.O. MARSHALL  
CHAPTER 13 TRUSTEE  
55 East Monroe, Suite 3850  
Chicago, IL 60603  
(312) 294-5900